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October 7, 2024

The Hon. Michael A. Hammer, U.S.M.J.  
U.S. District Court, District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

RE: Saint-Jean v. Holland et al.  
Case No. 19-cv-10680-EP-MAH

Dear Judge Hammer:

We represent Plaintiff Fernando Saint-Jean in the above-mentioned matter. I'm writing this letter to request that the Court permit the Parties to appear virtually for the settlement conference scheduled for October 8, 2024. Defendants' counsel consents to this request.

As the Court is aware, Plaintiff requested on October 4, 2024 that the conference be cancelled as the Parties were too far apart in their respective settlement positions. The Court denied this request on October 7, 2024 and Ordered that the conference proceed as scheduled. We respectfully request that the conference be held virtually as Plaintiff is a resident of Brockton, Massachusetts, and Plaintiff's counsel is a resident of Buffalo, New York. In light of the fact that the Parties remain far apart in the settlement positions and the great travel distances required for Plaintiff and the undersigned to attend this conference in person, we respectfully request that the settlement conference be held virtually.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,  
**HORN WRIGHT, LLP**  
*Attorneys for Plaintiff*

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